NEBRASKA STATE FIRE MARSHAL OFFICIAL INTERPRETATION



Interpretation Number: 05-04

Date: 01 February 2007

Pamphlet Number: NFPA 101

Section(s): 18/19.3.2.7

Comments:

This interpretation is in compliance with CMS rules. It applies to all forms of product including aerosol and foam type dispensers.

Question: Are alcohol-based hand-rub dispensers permitted in the corridors of health care occupancies?

Response: Yes. When the following rules are met, alcohol-based hand-rub dispensers are permitted in the corridors of new and existing health care occupancies.

Alcohol-based Hand-rub Solutions. Alcohol-based hand-rub (ABHR) dispensers shall meet all of the following requirements unless they are protected in accordance with NFPA 101 8.4.3 (Flammable Liquids and Gas requirements)

- (1) Where dispensers are installed in a corridor, the corridor shall have a minimum width of 6 ft.
- (2) The maximum individual dispenser fluid capacity shall be:
- (a) 0.3 gallons (1.2 liters) for dispensers in rooms, corridors, and areas open to corridors
- (b) 0.5 gallons (2.0 liters) for dispensers in suites of rooms
- (3) The dispensers shall have a minimum horizontal spacing of 4 ft (1.2 m) from each other.
- (4) Not more than an aggregate 10 gallons (37.8 liters) of alcohol-based hand rub solution shall be in use in a single smoke compartment outside of a storage cabinet.
- (5) Storage of quantities greater than 5 gallons (18.9 liters) in a single smoke compartment shall meet the requirements of NFPA 30, Flammable and Combustible Liquids Code.
- (6) The dispensers shall not be installed over or directly adjacent to an ignition source. (The dispensers shall be separated at least 12 inches horizontally from any ignition source. (Electrical outlet, light switch,etc.)
- (7) In locations with carpeted floor coverings (this would include corridors and resident rooms), dispensers installed directly over carpeted surfaces shall be permitted only in sprinklered smoke compartments.

(Items 1-7 are from NFPA 101 18.3.2.7, 19.3.2.7)

- (8) The dispensers shall be installed in a manner to minimize leaks and spills that could lead to falls. (CMS requirement)
- (9) The dispensers shall be installed in a manner that are adequately protected against access by vulnerable populations, such as residents in psychiatric units or residents of dementia wards. ABHR solutions could be used to start fires that would endanger the lives of residents/patients of the facility. (CMS requirement)

Signature: Date: 02/01/07

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